

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:)	
)	
Office Of Engineering And Technology,)	GN Docket No. 18-122
International, And Wireless Telecommunications)	
Bureaus Seek Comment For Report On The)	
Feasibility Of Allowing Commercial Wireless)	
Services, Licensed Or Unlicensed, To Use Or Share)	
Use Of The Frequencies Between 3.7-4.2 GHz)	

COMMENTS OF AT&T SERVICES, INC.

AT&T Services, Inc. (“AT&T”), on behalf of the subsidiaries and affiliates of AT&T Inc. (collectively, “AT&T”), hereby submits the following comments in response to the Federal Communications Commission’s (“FCC’s” or “Commission’s”) *Public Notice* in the above-captioned proceeding.¹ Pursuant to Section 605(b) of the MOBILE NOW Act,² the *Public Notice* seeks comment on the potential use of the 3.7-4.2 GHz band for licensed or unlicensed commercial wireless services. Consistent with staff instructions, AT&T provides in response an abbreviated filing that incorporates by reference its submissions in related proceedings and succinctly summarizes the substantive arguments made therein.³ At bottom, AT&T strongly

¹ Office Of Engineering And Technology, International, And Wireless Telecommunications Bureaus Seek Comment For Report On The Feasibility Of Allowing Commercial Wireless Services, Licensed Or Unlicensed, To Use Or Share Use Of The Frequencies Between 3.7-4.2 GHz, *Notice and Opportunity for Public Comment under Section 605(b) of the MOBILE NOW Act*, GN Docket No. 18-122, DA 18-446 (May 1, 2018) (“*Public Notice*”).

² Title VI, Consolidated Appropriations Act, 2018, P.L. 115-141, Division P, the Repack Airwaves Yielding Better Access for Users of Modern Services (RAY BAUM’S) Act.

³ AT&T incorporates by reference its filings made in GN Docket No. 17-183. *See* Comments of AT&T Service, Inc., GN Docket No. 17-183 (filed Oct. 2, 2017); Reply Comments of AT&T Services, Inc., GN Docket No. 17-183 (filed Nov. 15, 2017); Letter from Alex Starr, AT&T

supports the allocation of additional spectrum for licensed mobile terrestrial wireless services, and urges the Commission to explore the potential for sharing with such services in the 3.7-4.2 GHz band.

AT&T brings a unique perspective to the lower C-Band, inasmuch as AT&T is both a commercial wireless operator continuously seeking new spectrum to meet the broadband mobile needs of the American public, and a substantial user of C-Band satellite resources both for its telecommunications operations and for its video distribution businesses. AT&T has campaigned, and continues to campaign, for more licensed terrestrial spectrum for commercial mobile operators to satisfy the exponential increase in data consumption by consumers, and thereby fuel the growth of domestic businesses and industries that rely on connectivity anywhere and anytime. Balanced against that objective, AT&T uses C-Band fixed satellite services (“FSS”) to provide basic interconnectivity to remote villages in Alaska, to rapidly restore communications services in damaged locations like Puerto Rico after Hurricane Irma, and to efficiently acquire video content for the tens of millions of end-user customers who rely on DIRECTV and U-Verse for television services. The C-Band possesses unique reliability and other characteristics that make it particularly prized for such applications, many of which cannot be replicated using alternative media or alternative bands.

AT&T is optimistic that there may exist opportunities for sharing the lower C-Band between FSS and licensed mobile terrestrial operations. The FCC has recently undertaken further investigation into the actual use of the lower C-Band, a step that AT&T has

Services, Inc., to Marlene Dortch, Secretary, Federal Communications Commission, GN Docket No. 17-183 (filed Mar. 12, 2018).

recommended as a necessary prerequisite to an informed sharing discussion.⁴ Various proposals for a market-based transaction have been suggested, including an FCC-driven auction mechanism and a private solution under which FSS satellite operators, in conjunction with potential terrestrial mobile users, would develop a centralized clearing mechanism to consolidate satellite operations in the C-Band. Regardless of which way the FCC proceeds, AT&T has argued a necessary precondition is addressing the continued needs and protection rights of incumbents.

AT&T believes the 3.7-4.2 GHz band could serve vital needs for mobile terrestrial wireless carriers in meeting broadband data needs and allowing deployment of 5G services. But

⁴ AT&T is thus gratified to see that the FCC recently adopted a licensing freeze for the C-Band and a 90-day filing window for current operators to file applications for existing stations. *See Temporary Freeze On Applications For New Or Modified Fixed Satellite Service Earth Stations And Fixed Microwave Stations In The 3.7-4.2 GHz Band; 90-Day Window To File Applications For Earth Stations Currently Operating In 3.7-4.2 GHz Band, Freeze and Filing Window in Furtherance of the Commission's Pending Inquiry in GN Docket Nos. 17-183, 18-122, GN Docket Nos. 17-183, 18-122, DA 18-398 (rel. Apr. 19, 2018).*

the FCC should thoroughly investigate regulatory options for allowing such use while still accommodating the existing and future needs of C-Band FSS users that rely on the band's unique characteristics.

Respectfully submitted,

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Dated: May 31, 2018